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November 20, 2014

VIA ECF

Honorable Peter G. Sheridan, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: In re Lipitor Antitrust Litigation
Civil Action No. 12-2389 (PGS/DEA); MDL No. 2332**

Dear Judge Sheridan:

This firm, together with White & Case LLP, represents Defendants Pfizer Inc., Pfizer Ireland Pharmaceuticals, Warner-Lambert Co., and Warner-Lambert Co. LLC (collectively, "Pfizer") in connection with the above referenced matter. In response to the questions posed at the November 6, 2014 hearing, we write to provide a status update of the following motions¹ in the above captioned litigation:

¹ In addition to these motions, the Court also sought the status of the following motions:

1. Ranbaxy Defendants' Motion to Dismiss End-Payor Plaintiffs' Consolidated Class Action Complaint and Jury Demand (Nov. 26, 2013), ECF No. 491;
2. Pfizer Defendants' Motion to Dismiss End-Payor Plaintiffs' Consolidated Class Action Complaint and Jury Demand (Nov. 26, 2013), ECF No. 494;
3. End-Payor Plaintiffs' Motion to Strike Pfizer's Implied Request for Judicial Notice (Jan. 17, 2014), ECF No. 514;
4. Motion to Amend/Correct End-Payor Plaintiffs' Amended Consolidated Class Action Complaint (Jan. 17, 2014), ECF No. 516; and
5. Motion for an Order Authorizing Direct Filing *Nunc Pro Tunc* by Stephen Dewayne Simmons (July 9, 2012), ECF No. 57.

These motions have been mooted by the Court's November 17, 2014 Order, ECF No. 618.

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- Ranbaxy Defendants' Renewed Motion to Dismiss Direct Purchaser Plaintiffs' Amended Complaints (Nov. 26, 2013), ECF No. 490. This motion was granted by the Court in its September 12, 2014 Order. *See* Order (Sept. 12, 2014), ECF No. 567 ("September 12 Order").
- Pfizer Defendants' Motion to Dismiss All Direct Purchaser Amended Complaints (Nov. 26, 2013), ECF No. 493. This motion was granted by the Court in its September 12 Order.
- Motion to Seal Portions of Defendants' Opposition to Direct Purchaser Class Plaintiffs' Motion to Amend the Judgment and for Leave to Amend by Pfizer (Oct. 27, 2014), ECF No. 596. This motion was granted by the Court on November 18, 2014. *See* Order to Seal (Nov. 18, 2014), ECF No. 619.

We are available at the Court's convenience should Your Honor or Your Honor's staff have any additional questions regarding these matters. We thank Your Honor for his continued attention to this matter.

Respectfully submitted,

/s/ Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF)